

Comments in the Matter of RM-11305  
Petition for Rulemaking

Re: Amendment of Part 97 of the Commission's Rules  
Governing the Amateur Radio Service  
Petition For Spectrum Deregulation in the Amateur Service

Dear Commissioners;

As I understand it, the petitioner, a self appointed think tank of radio operators, is requesting that the current allocations regarding permissible emission modes in certain parts of the amateur bands be done away with entirely. Furthermore, they suggest that alleviation of interference amongst operators would be adequately replaced with a voluntary system of frequency/mode selection by gentlemanly discretion and good engineering practice. These ideas are absolutely absurd!

Anyone who has spent time listening to the operations within Amateur Radio spectrum over the last decade or so can discern a distinct change in the technical and behavioral practices exhibited on these frequencies. While this is a significant, if not dominant, matter for discussion regarding amateur radio these days, suffice to say that the observable changes call for more regulatory initiative, not less.

While it is likely that a large portion of good operators, wishing to be free of the boundaries currently imposed, would likely establish a mutually agreed upon set of practices precluding total bedlam, it is equally likely that their practices will favor their particular type of operations with neither input from or sufficient consideration for the other operations on the bands. Their justification will be, as is often heard, "It's legal, therefore I can".

This is to say nothing of those operators who would see such deregulation as encouragement to do whatever, wherever. A very small and simple example of this mentality can be evidenced in the selection of sidebands. It has always been customary to use Lower Sideband below 20 Meters and Upper Sideband on 20 meters and above. Even the occasional use of this narrow operating mode (typically 2.5 KHz or less) on the opposite sideband is an annoyance to the surrounding operators. But, since sideband selection is only customary, and by "gentleman's agreement", it violates no regulation to be contrary to the majority, regardless of the obvious interference it creates and stupidity it exemplifies. Imagine what havoc a small cadre of operators, armed with the "legality" of being able to do anything, anywhere, would reek on the amateur radio spectrum. I can assure you it would be a major source of problem for the FCC as well as the Amateur Operators themselves.

As absurd as this petition may be, I would be remiss not to say that it does by its extremity to well illuminate a need for reconsideration of the current boundaries imposed, or lacking, for modes of operation which have become prevalent by the recent application of new technologies to the Amateur Radio bands.

Such reallocations would therefore be in order only following a careful and thorough examination of spectral usage by a larger, and perhaps less passionate body of individuals. Such a study, given adequate time, covering more varied propagation cycles, taking public input and utilizing more engineering principles, would likely reveal a far less drastic approach to good spectral governance than the abdication of all previous regulatory necessity.

Very Truly Yours,

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